

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

Cr. No. 10-20194-Ma

WILLIAM HARNESS,

Defendant.

DEFENDANT'S MOTION TO CONTINUE REPORT DATE

COMES NOW the defendant, William Harness, through appointed counsel, and respectfully moves this Honorable Court to continue the report date currently set for Friday, February 25, 2011 at 2:00 p.m. Counsel would ask that the hearing be continued for thirty (30) days. In support thereof, undersigned counsel has been negotiating a plea agreement with the government, recently received a draft copy of the government's proposal, and sent a copy to defendant, who lives in Nashville, Tennessee. Defendant would like additional time to discuss a plea to the proposed agreement and its ramifications with counsel. Counsel contacted Assistant United States Attorney, Joe Murphy, concerning this request, and he has no objections.

WHEREFORE, PREMISES CONSIDERED, defendant respectfully moves this Honorable Court to grant the motion and continue the report date in this matter for thirty (30) days.

Respectfully submitted,

STEPHEN B. SHANKMAN
FEDERAL DEFENDER

s/ DAVID M. BELL
Assistant Federal Defender
200 Jefferson Avenue, Suite 200
Memphis, TN 38103
(901) 544-3895

CERTIFICATE OF SERVICE

Undersigned hereby certifies that a true copy of the foregoing Defendant's Motion to Continue Report Date was forwarded by electronic means via the Court's electronic filing system to Joe Murphy, Assistant U.S. Attorney, 167 N. Main, Suite 800, Memphis, TN 38103.

This 22nd day of February, 2011.

s/ DAVID M. BELL
Assistant Federal Defender